REMARKS

The Office action of 11 July 2007 (Paper No. 20070624) has been carefully considered.

Claims 3, 7, 10 and 11 are being amended. Thus, claims 1-12 are pending in the application.

On page 2 of the Office action, the Examiner rejected claims 1 thru 12 under 35 U.S.C. §112 (second paragraph) because "shelf" is not clearly defined. In that regard, it is submitted that the term "shelf" is a term well known to those of ordinary skill in the art, as evidenced by the use of the term as defined in paragraph [0005] of Onno *et al.*, US Publication No. 2004/0136394 cited by the Examiner in this application. Therefore, the rejection under 35 U.S.C. 112 (second paragraph) should be withdrawn.

On page 2 of the Office action, the Examiner rejected claims 1, 4, 5, 8, 9 and 12 under 35 U.S.C. §103 for alleged unpatentability over Onno *et al.*, U.S. Patent Publication No. 2004/0136394 in view of "Applicant's Admitted Prior Art (AAPA)". On page 4 of the Office action, claims 2, 3, 6, 7, 10 and 11 are objected to for dependency upon a rejected base claim, but the Examiner stated that these claims would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. For the reasons stated below, it is submitted that the invention

recited in the claims, as now amended, is distinguishable from the prior art cited by the

Examiner so as to preclude rejection under 35 U.S.C. §103.

The present invention relates to a method for batch registration of an integrated

digital loop carrier (IDLC) subscriber using program loaded data (PLD) of an exchange,

and an element management system (EMS) server for the same. More particularly, the

invention relates to a method for batch registration of an IDLC subscriber using PLD of

an exchange which can automatically open thousands to scores of thousands of IDLC

subscribers which will be accepted in an access media gateway by using PLD information

generated in the exchange, and to an EMS server for the same purpose.

In the method, an operator opens a program loaded data (PLD) file of an exchange

selected by a client terminal accessing through a network, extracts subscriber information

from the program loaded data (PLD) file, designs and designates a shelf for accepting

subscribers, transmits a command for registering subscribers in the designated shelf,

performs batch registration of subscribers for the shelf, receives verification information

for registration of subscribers from the shelf, and displays the result on a graphical user

interface of the client terminal. As a result, when a semielectronic exchange is replaced

by an access media gateway, batch registration of an integrated digital loop carrier

(IDLC) subscriber is performed by using the program loaded data (PLD) of the exchange.

The primary reference relied upon by the Examiner is Onno *et al.*, U.S. Patent Publication No. 2004/0136394.

Onno *et al.* '394 relates to a bulk digital subscriber line (DSL) service provisioning configuration tool for use in a network management context and method. The bulk DSL service provisioning tool enables the specification of a programmable configuration request including specifying a target entity list and a configuration template. In turning up a subscriber, the configuration template is further populated with: operational parameter values used configuring a corresponding DSL port associated with the subscriber, a request to setup a cross connect at a DSL aggregation module (DSLAM) node associated with the subscriber's DSL port, and a request to setup a data link between the DSLAM node and a broadband remote access server node. Advantages are derived from an ability to perform controlled large scale DSL service configuration management in a network management context at reduced service provisioning overheads.

The invention differs from the cited prior art in the following respects:

(1)   Onno *et al.* '394 does not disclose a method or system for batch registration of an integrated digital loop carrier (IDLC) subscriber, as admitted by the Examiner at page 3 line 20 - page 4, line 1 of the Office action;

(2)   Onno *et al.* '394 does not disclose step (c) of method claims 1 and 5, and the corresponding function of the "receiving and displaying means" of

claim 9;

(3)   Onno *et al.* '394 does not disclose step (d) of method claims 1 and 5, and the corresponding function of the "additional receiving and displaying means" of claim 9; and

(4)   Onno *et al.* '394 does not disclose step (e) of method claims 1 and 5, and the corresponding function of the "transmitting means" of claim 9.

With respect to item (1) above, whereas the Examiner cites "Applicant's Admitted Prior Art" (hereinafter "AAPA") to overcome the admitted deficiency of Onno *et al.* '394, the disclosure of the present application does not contain an admission that a method or system for batch registration of an IDLC subscriber existed in the prior art prior to the present invention. In fact, the "Related Art" section of the present application merely mentions that IDLC has existed as one of the methods for building a switched network (see paragraph [0003] of the specification). In addition, the information provided in the "Related Art" section is not presented as admitted prior art or AAPA unless Applicant cites, with that information, a prior patent or publication predating the date of the invention.

With respect to item (2) above, the Examiner cites paragraph [0005] and Figure 7 of Onno *et al.* '394 for alleged disclosure of step (c) of claims 1 and 5, and the corresponding function of the "receiving and displaying means" of claim 9, but the cited

paragraph of Onno *et al.* '394 does not contain any such disclosure, does not even mention "shelf range" or the related steps or functions, as claimed, does not relate to Figure 7, and merely discloses differences in the communication equipment provided by various vendors. In contrast, in Figure 4 of the present application, the shelf SUWONIT03 is able to have 1024 ports, and thus the shelf and port must be discriminated. Therefore, the prior art does not teach batch registration as in the present invention. Furthermore, the Examiner's statement of "inherency" is not valid in the absence of any support in the cited reference or another reference.

With respect to item (3) above, the Examiner only cites Figure 7 of Onno *et al.* '394. Thus, the arguments in the preceding paragraph above apply equally here. Moreover, paragraphs [0076]-[0095] discuss Figure 7, but contain no disclosure or mention or suggestion of step (d) of claims 1 and 5 or the corresponding functions of claim 9. Furthermore, step (d) of claims 1 and 5 recites the feature of selecting the range of a subscriber, which may be a user using a communication service. However, the "USER" of Figure 7 of Onno *et al.* '394 merely refers to an operator's or manager's ID, and the list (760) is merely a means for reporting/displaying job progress. Thus, there is no disclosure or suggestion of reception/display of a subscriber list as recited in step (d).

With respect to item (4) above, the Examiner cites paragraph [0044], lines 13-17, paragraph [0046] and Figure 4 of Onno *et al.* '394, but these citations do not disclose or

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suggest step (e) of claims 1 and 5 or the functions of the "transmitting means" recited in claim 9. In fact, there is no mention, in the cited portions of the reference, of "batch registration" as claimed, and in fact paragraph [0044], lines 13-17 are not related to the claimed steps or functions, paragraph [0046] is merely a description of Figure 4, and Figure 4 itself merely describes operations carried out with respect to programmable configuration requests (PCRs).

In view of the above, it is submitted that the claims of this application are in condition for allowance, and early-issuance thereof is solicited. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's attorney.

No fee is incurred by this Amendment.

Respectfully submitted,
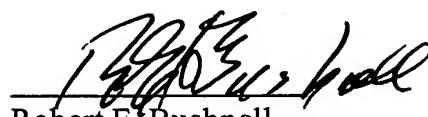
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